

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MALONE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
(APWU/USPS-T1-1 THROUGH 6)**

The United States Postal Service today files the responses of witness Linda Malone to the above-identified interrogatories of the American Postal Workers Union, dated January 29, 2014. The interrogatories are stated verbatim and followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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February 5, 2014

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY

APWU/USPS-T1-1 In response to PR/USPS-T1-15 the Postal Service provided LRN2014-1-13. It seems to show that the number of cancellation runs that had to be extended past their usual time increased during the Suburban Maryland load leveling test period.

- a) Was this due to the test being done in December? If not, is there another explanation for this result?
- b) Will the full results of this test be submitted to the record prior to the record closing?
- c) When do you anticipate having the full results of this test available?

RESPONSE

- (a) Yes, the cancellation runs in Southern Maryland were extended due to the higher than normal cancellation volumes experienced during December.

An additional impact to the cancellation runs on December 9 happened when a winter storm passed through the area on December 8, resulting in a sharp increase in unscheduled employee absences on December 9.

- (b-c) The purpose of the “post-Southern Jersey” operations tests (including Southern Maryland) is to obtain more extensive experience in implementing the planned service change by testing it in a variety of different mail processing plant and delivery unit environments, and identifying practices that will improve the implementation of the service change on a system-wide basis. My headquarters team will be working in concert with postal managers at the various test sites to gather and disseminate information relevant to implementation to managers throughout the network to ensure that the planned system-wide implementation is as smooth as possible. I am advised that if such implementation materials are finalized for dissemination to the field before

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RESPONSE to APWU/USPS-T1-1 (continued)

the close of the evidentiary record, we will file them in this docket.

Meanwhile, as indicated on page 16 of my testimony, we will file periodic reports for the Capital District test sites, which will continue into March 2014, while the evidentiary record is open.

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APWU/USPS-T1-2 On page 15 of your testimony, you indicate the results of the New Jersey test “validated the expectation that targeted workload leveling could improve local operations.” Please describe other options considered by the Postal Service to improve local operations other than degrading service standards and increasing the associated operational problems for mailers?

RESPONSE

The options that Workgroup 157 considered are summarized in my testimony at pages 8-11.

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APWU/USPS-T1-3 Can you provide piece counts of the mail that was actually delayed for an additional day beyond the current service standards during the New Jersey and Suburban Maryland tests?

RESPONSE

No. Specific piece counts were not taken during the South Jersey test and are not being taken as part of the other tests.

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APWU/USPS-T1-4 Can you provide the percentage or approximate percentage of standard mail that was actually delayed for an additional day beyond the current service standards during the New Jersey and Suburban Maryland tests?

RESPONSE

In the case of flat shaped mail introduced at the DSCF rate, virtually all of this mail was delivered on the final day of the new deferrable window during the South Jersey test because, for purposes of the test, this mail was tightly controlled, staged in trailers and special staging areas and dispatched to delivery units on the afternoon prior to the intended delivery day. In the case of letter shaped DSCF Standard Mail, I cannot provide an estimate for the South Jersey test. This is due to the continual shifting of volumes to level the volume processed through DPS during the days of the week in order to not exceed processing capacities and result in the potential for delayed mail. We are not staging and controlling DSCF Standard Mail flats in Southern Maryland as we did in South Jersey, so I have no basis for determining the percentage of DSCF Standard Mail flats that are delivered on Day 4 after acceptance strictly as a result of the test. For the same reasons as apply to South Jersey, I have no basis for estimating what percentage of DSCF Standard Mail letters are delivered on Day 4 strictly as a result of the test.

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APWU/USPS-T1-5 Has the Postal Service made estimates of how much mail volume, mail revenue and mail contribution it may lose by degrading the service standards for DSCF mail? If so, please provide that information.

RESPONSE

The Postal Service has not developed an estimate of the extent to which the planned service change may adversely affect volume, revenue, or contribution.

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APWU/USPS-T1-6 Has USPS surveyed mailers to determine how many DSCF Standard mailers want Monday delivery and may change their drop dates under the proposed new standards so as to receive a Monday delivery? If so, what is the estimate of the number mailers and associated volume?

RESPONSE

No such survey has been conducted.